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10	LINITED STATES	DISTRICT COURT
11		JFORNIA, OAKLAND DIVISION
12	TORTHER DISTRICT OF CALL	in Oldvin, Orinizativis Sivision
13	CHASOM BROWN, et al., individually and	Case No. 4:20-cv-03664-YGR-SVK
14	on behalf of all similarly situated,	[PROPOSED] ORDER GRANTING MOTION TO SEAL
15	Plaintiffs,	
16	v.	Judge: Hon. Susan van Keulen, USMJ
17	GOOGLE LLC,	
18		
19	Defendant.	
-/	Defendant.	
20	Defendant.	
	Defendant.	
20	Defendant.	
20 21	Defendant.	
20 21 22	Defendant.	
20 21 22 23	Defendant.	
2021222324	Defendant.	
 20 21 22 23 24 25 	Defendant.	
20 21 22 23 24 25 26	Defendant.	
20 21 22 23 24 25 26 27	Defendant.	Case No. 4:20-cv-03664-YGR-SVK

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[PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion to Seal Portions of Google's Response to the Court's October 27, 2022 Order to Show Cause, Dkt. 784 ("Google's Motion"). Having considered Google's Motion, supporting declarations, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

6	Document	Text To Be Sealed	Basis for Sealing Portion of Document
7	GOOGLE	GRANTED as to the portions at:	The information requested to be sealed
8	LLC'S	-	contains Google's highly confidential
9	RESPONSE TO THE	Pages: i:8, i:11, i:13-19, 3:13, 3:23-24, 4:4, 4:17, 4:19, 4:22, 4:27, 5:3-5,	and proprietary information regarding highly sensitive features of Google's
10	COURT'S OCTOBER	5:13-15, 5:20, 5:22-23, 5:25, 5:27, 6:1, 6:3, 6:5, 6:7, 6:9, 6:17-19, 6:27,	internal systems and operations, including various types of related
11	27, 2022 ORDER TO	7:9-10, 7:12, 7:15-17, 7:21-23, 7:25-28, 8:1-3, 8:5-10, 8:12, 8:14-15,	Google's internal projects, internal databases, data signals, and logs, and
12	SHOW CAUSE	8:18-26, 9:1-2, 9:4-9, 9:11-12, 9:14- 16, 9:18-26, 10:1-12, 10:16-26,	their proprietary functionalities, as well as internal metrics, that Google
13	(DKT. 784)	10:28, 11:1-16, 11:18-20, 11:22-28,	maintains as confidential in the
14		12:1, 12:3-4, 12:6-16, 16:4-6, 16:21, 17:1-3, 17:28, 18:1-2, 18:8-9, 22:5-	ordinary course of its business and is not generally known to the public or
15		7, 22:10	Google's competitors. Such confidential and proprietary
16			information reveals Google's internal
17			strategies, system designs, and business practices for operating and maintaining
18			many of its important services, and falls within the protected scope of the
19			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of
20			such confidential and proprietary
21			information could affect Google's competitive standing as competitors
22			may alter their systems and practices relating to competing products. It may
23			also place Google at an increased risk of cybersecurity threats, as third parties
24			may seek to use the information to
25			compromise Google's internal practices relating to competing products.
26	Trebicka Exhibit 2	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential
27	6/17/21 Berntson	Pages 4:12, 4:18, 4:21, 5:5-6, 198:7,	and proprietary information regarding
28	Depo Trans. Excerpts	198:18, 199:17, 201:4-5, 372:11, 372:15, 375:9, 395:24, 396:14	highly sensitive features of Google's internal systems and operations,

Case No. 4:20-cv-03664-YGR-SVK

			,
1			including various types of related
2			Google's internal projects, internal databases, data signals, and logs, and
			their proprietary functionalities, as well
3			as internal metrics, that Google
4			maintains as confidential in the
_			ordinary course of its business and is
5			not generally known to the public or
6			Google's competitors. Such confidential and proprietary
_			confidential and proprietary information reveals Google's internal
7			strategies, system designs, and business
8			practices for operating and maintaining
			many of its important services, and falls
9			within the protected scope of the
10			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of
11			such confidential and proprietary
11			information could affect Google's
12			competitive standing as competitors
13			may alter their systems and practices
13			relating to competing products. It may also place Google at an increased risk of
14			cybersecurity threats, as third parties
15			may seek to use the information to
			compromise Google's internal practices
16		GD ANTED	relating to competing products.
17	Trebicka Exhibit 3	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential
	2/18/22	Pages 230:24, 231:6-8, 231:10,	and proprietary information regarding
18	McClelland	231:17-19, 231:21, 231:23-25	highly sensitive features of Google's
19	Depo Trans.		internal systems and operations,
20	Excerpts		including various types of related
20			Google's internal projects, internal
21			databases, data signals, and logs, and their proprietary functionalities, as well
22			as internal metrics, that Google
			maintains as confidential in the
23			ordinary course of its business and is not generally known to the public or
24			Google's competitors. Such
25			confidential and proprietary
25			information reveals Google's internal
26			strategies, system designs, and business practices for operating and maintaining
27			many of its important services, and falls
			within the protected scope of the
28			Protective Order entered in this action.

1				See Dkt. 81 at 2-3. Public disclosure of
$_{2}$				such confidential and proprietary
				information could affect Google's competitive standing as competitors
3				may alter their systems and practices
4				relating to competing products. It may
_				also place Google at an increased risk of
5				cybersecurity threats, as third parties
6				may seek to use the information to compromise Google's internal practices
7				relating to competing products.
<i>'</i>		Declaration of	GRANTED as to the portions at:	The information requested to be sealed
8		Vineet	December 1.15 16 1.20 1.22 20 2.5	contains Google's highly confidential
9		Kahlon	Pages 1:15-16, 1:20, 1:22-28, 2:5, 2:14-17, 2:19, 2:21-3:1, 3:4, 3:7-12	and proprietary information regarding highly sensitive features of Google's
10			2.11 17, 2.12, 2.21 3.1, 3.1, 3.7 12	internal systems and operations,
10				including various types of related
11				Google's internal projects, internal
12				databases, data signals, and logs, and their proprietary functionalities, as well
				as internal metrics, that Google
13				maintains as confidential in the
14				ordinary course of its business and is
1.5				not generally known to the public or Google's competitors. Such
15				confidential and proprietary
16				information reveals Google's internal
17				strategies, system designs, and business
				practices for operating and maintaining many of its important services, and falls
18				within the protected scope of the
19				Protective Order entered in this action.
20				See Dkt. 81 at 2-3. Public disclosure of
20				such confidential and proprietary information could affect Google's
21				competitive standing as competitors
22				may alter their systems and practices
				relating to competing products. It may also place Google at an increased risk of
23				cybersecurity threats, as third parties
24				may seek to use the information to
25				compromise Google's internal practices
		Kahlon	GRANTED as to the portions at:	relating to competing products. The information requested to be sealed
26		Exhibit A	GIVENTED as to the portions at.	contains Google's highly confidential
27		GOOG-	Seal Entirely	and proprietary information regarding
28		CABR- 04430230		highly sensitive features of Google's
20		UTTJU2JU		internal systems and operations,

			,
1			including various types of related
2			Google's internal projects, internal
			databases, data signals, and logs, and their proprietary functionalities, as well
3			as internal metrics, that Google
4			maintains as confidential in the
			ordinary course of its business and is
5			not generally known to the public or
6			Google's competitors. Such confidential and proprietary
			confidential and proprietary information reveals Google's internal
7			strategies, system designs, and business
8			practices for operating and maintaining
			many of its important services, and falls
9			within the protected scope of the
10			Protective Order entered in this action.
			See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
11			information could affect Google's
12			competitive standing as competitors
10			may alter their systems and practices
13			relating to competing products. It may
14			also place Google at an increased risk of cybersecurity threats, as third parties
1.5			may seek to use the information to
15			compromise Google's internal practices
16			relating to competing products.
17	Kahlon	GRANTED as to the portions at:	The information requested to be sealed
1 /	Exhibit C GOOG-	Sool Entiroly	contains Google's highly confidential
18	CABR-	Seal Entirely	and proprietary information regarding highly sensitive features of Google's
19	04737037		internal systems and operations,
			including various types of related
20			Google's internal projects, internal
21			databases, data signals, and logs, and their proprietary functionalities, as well
22			as internal metrics, that Google
22			maintains as confidential in the
23			ordinary course of its business and is
24			not generally known to the public or
∠ 4			Google's competitors. Such confidential and proprietary
25			information reveals Google's internal
26			strategies, system designs, and business
			practices for operating and maintaining
27			many of its important services, and falls
28			within the protected scope of the Protective Order entered in this action.
			1 Total Citation III this action.

1			See Dkt. 81 at 2-3. Public disclosure of
$_{2}$			such confidential and proprietary
			information could affect Google's competitive standing as competitors
3			may alter their systems and practices
4			relating to competing products. It may
_			also place Google at an increased risk of
5			cybersecurity threats, as third parties
6			may seek to use the information to compromise Google's internal practices
7			relating to competing products.
<i>'</i>	Declaration of	GRANTED as to the portions at:	The information requested to be sealed
8	Xianzhi Liu	D 1.14 1.10 20 2.1 0 2.11 12	contains Google's highly confidential
9		Pages 1:14, 1:19-28, 2:1-9, 2:11-12, 2:14-19, 2:23-27, 3:1	and proprietary information regarding highly sensitive features of Google's
		2.14 17, 2.23 27, 3.1	internal systems and operations,
10			including various types of related
11			Google's internal projects, internal
12			databases, data signals, and logs, and their proprietary functionalities, as well
			as internal metrics, that Google
13			maintains as confidential in the
14			ordinary course of its business and is
1.5			not generally known to the public or Google's competitors. Such
15			confidential and proprietary
16			information reveals Google's internal
17			strategies, system designs, and business
			practices for operating and maintaining many of its important services, and falls
18			within the protected scope of the
19			Protective Order entered in this action.
20			See Dkt. 81 at 2-3. Public disclosure of
20			such confidential and proprietary information could affect Google's
21			competitive standing as competitors
22			may alter their systems and practices
			relating to competing products. It may
23			also place Google at an increased risk of cybersecurity threats, as third parties
24			may seek to use the information to
25			compromise Google's internal practices
	Liu Exhibit A	CDANTED as to the mentions of	relating to competing products.
26	GOOG-	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential
27	BRWN-	Seal Entirely	and proprietary information regarding
	00858530		highly sensitive features of Google's
28			internal systems and operations,

	T	T. 1 1
		including various types of related Google's internal projects, internal
		databases, data signals, and logs, and
		their proprietary functionalities, as well
		as internal metrics, that Google
		maintains as confidential in the
		ordinary course of its business and is
		not generally known to the public or
		Google's competitors. Such
		confidential and proprietary
		information reveals Google's internal
		strategies, system designs, and business
		practices for operating and maintaining
		many of its important services, and falls
		within the protected scope of the
		Protective Order entered in this action.
		See Dkt. 81 at 2-3. Public disclosure of
		such confidential and proprietary
		information could affect Google's
		competitive standing as competitors
		may alter their systems and practices
		relating to competing products. It may
		also place Google at an increased risk of
		cybersecurity threats, as third parties
		may seek to use the information to compromise Google's internal practices
Declaration of	GRANTED as to the portions at:	relating to competing products. The information requested to be sealed
Eric Maki	ORANTED as to the portions at.	contains Google's highly confidential
Elic Maki	Pages 1:15, 1:18, 1:20, 1:22-2:15,	and proprietary information regarding
	2:17-21, 2:26-28, 3:2-4, 3:7, 3:9,	highly sensitive features of Google's
	3:11, 3:13, 3:15-20, 3:22, 3:24-25,	internal systems and operations,
	4:1-2, 4:4, 4:6, 4:8	including various types of related
	4.1-2, 4.4, 4.0, 4.0	Google's internal projects, internal
		databases, data signals, and logs, and
		their proprietary functionalities, as well
		as internal metrics, that Google
		maintains as confidential in the
		ordinary course of its business and is
		not generally known to the public or
		Google's competitors. Such
		confidential and proprietary
		information reveals Google's internal
		strategies, system designs, and business
		practices for operating and maintaining
		many of its important services, and falls
		within the protected scope of the
		Protective Order entered in this action.
		1 TOLCHIVE OTHER EMERCE III HIIS ACTION.

1			See Dkt. 81 at 2-3. Public disclosure of
2			such confidential and proprietary
			information could affect Google's
3			competitive standing as competitors may alter their systems and practices
4			relating to competing products. It may
4			also place Google at an increased risk of
5			cybersecurity threats, as third parties
			may seek to use the information to
6			compromise Google's internal practices
7	N. 11 D. 1711	CD ANTEED	relating to competing products.
	Maki Exhibit A	GRANTED as to the portions at:	The information requested to be sealed
8	GOOG-	Seal Entirely	contains Google's highly confidential and proprietary information regarding
9	BRWN-	Scar Entirely	highly sensitive features of Google's
	00858548		internal systems and operations,
10			including various types of related
11			Google's internal projects, internal
			databases, data signals, and logs, and
12			their proprietary functionalities, as well as internal metrics, that Google
13			maintains as confidential in the
			ordinary course of its business and is
14			not generally known to the public or
15			Google's competitors. Such
			confidential and proprietary
16			information reveals Google's internal
17			strategies, system designs, and business practices for operating and maintaining
			many of its important services, and falls
18			within the protected scope of the
19			Protective Order entered in this action.
			See Dkt. 81 at 2-3. Public disclosure of
20			such confidential and proprietary
21			information could affect Google's competitive standing as competitors
			may alter their systems and practices
22			relating to competing products. It may
23			also place Google at an increased risk of
			cybersecurity threats, as third parties
24			may seek to use the information to
25			compromise Google's internal practices relating to competing products.
	Declaration of	GRANTED as to the portions at:	The information requested to be sealed
26	Eugene Lee	as to the portions at:	contains Google's highly confidential
27		Pages 1:14, 1:17, 1:19, 1:21-26, 2:1,	and proprietary information regarding
20		2:3-7, 2:12-13, 2:15-17, 2:19-21,	highly sensitive features of Google's
28		2:27-28, 3:2-7, 3:10-15, 3:18-20,	internal systems and operations,

1		3:22, 3:24-4:4, 4:6, 4:8-12, 4:15-20,	including various types of related
2		4:23-24, 4:26-27, 5:4, 5:6-22, 5:26-	Google's internal projects, internal
		6:8, 6:11-17, 6:20-25, 6:27, 7:1-2, 7:5	databases, data signals, and logs, and their proprietary functionalities, as well
3		7.5	as internal metrics, that Google
4			maintains as confidential in the
7			ordinary course of its business and is
5			not generally known to the public or
6			Google's competitors. Such
0			confidential and proprietary
7			information reveals Google's internal
			strategies, system designs, and business practices for operating and maintaining
8			many of its important services, and falls
9			within the protected scope of the
			Protective Order entered in this action.
10			See Dkt. 81 at 2-3. Public disclosure of
11			such confidential and proprietary
			information could affect Google's
12			competitive standing as competitors
13			may alter their systems and practices relating to competing products. It may
			also place Google at an increased risk of
14			cybersecurity threats, as third parties
15			may seek to use the information to
			compromise Google's internal practices
16			relating to competing products.
17	Lee Exhibit A GOOG-	GRANTED as to the portions at:	The information requested to be sealed
1,	BRWN-	Seal Entirely	contains Google's highly confidential and proprietary information regarding
18	00858554	Scar Entirely	highly sensitive features of Google's
19			internal systems and operations,
			including various types of related
20			Google's internal projects, internal
21			databases, data signals, and logs, and
			their proprietary functionalities, as well as internal metrics, that Google
22			maintains as confidential in the
23			ordinary course of its business and is
			not generally known to the public or
24			Google's competitors. Such
25			confidential and proprietary
			information reveals Google's internal
26			strategies, system designs, and business practices for operating and maintaining
27			many of its important services, and falls
			within the protected scope of the
28			Protective Order entered in this action.
- 11			

1			See Dkt. 81 at 2-3. Public disclosure of
$_{2}$			such confidential and proprietary
			information could affect Google's competitive standing as competitors
3			may alter their systems and practices
4			relating to competing products. It may
			also place Google at an increased risk of
5			cybersecurity threats, as third parties
6			may seek to use the information to compromise Google's internal practices
			relating to competing products.
7	Lee Exhibit B	GRANTED as to the portions at:	The information requested to be sealed
8	GOOG-	1	contains Google's highly confidential
	BRWN-	Seal Entirely	and proprietary information regarding
9	00858520		highly sensitive features of Google's
10			internal systems and operations, including various types of related
11			Google's internal projects, internal
			databases, data signals, and logs, and
12			their proprietary functionalities, as well
13			as internal metrics, that Google maintains as confidential in the
			ordinary course of its business and is
14			not generally known to the public or
15			Google's competitors. Such
16			confidential and proprietary
10			information reveals Google's internal strategies, system designs, and business
17			practices for operating and maintaining
18			many of its important services, and falls
			within the protected scope of the Protective Order entered in this action.
19			See Dkt. 81 at 2-3. Public disclosure of
20			such confidential and proprietary
21			information could affect Google's
21			competitive standing as competitors
22			may alter their systems and practices relating to competing products. It may
23			also place Google at an increased risk of
			cybersecurity threats, as third parties
24			may seek to use the information to
25			compromise Google's internal practices relating to competing products.
26	Declaration of	GRANTED as to the portions at:	The information requested to be sealed
20	Maciej	_	contains Google's highly confidential
27	Kuzniar	Pages 1:12, 1:17, 1:19, 1:22-23,	and proprietary information regarding
28		1:25-27, 2:2, 2:4, 2:9, 2:12-18, 2:20- 22	highly sensitive features of Google's internal systems and operations,
		ı <i></i>	internal systems and operations,

1			including various types of related
$_{2}\Vert$			Google's internal projects, internal
			databases, data signals, and logs, and their proprietary functionalities, as well
3			as internal metrics, that Google
4			maintains as confidential in the
ہے			ordinary course of its business and is
5			not generally known to the public or Google's competitors. Such
6			confidential and proprietary
7			information reveals Google's internal
′			strategies, system designs, and business
8			practices for operating and maintaining
9			many of its important services, and falls within the protected scope of the
			Protective Order entered in this action.
10			See Dkt. 81 at 2-3. Public disclosure of
11			such confidential and proprietary
12			information could affect Google's competitive standing as competitors
12			may alter their systems and practices
13			relating to competing products. It may
14			also place Google at an increased risk of
17			cybersecurity threats, as third parties
15			may seek to use the information to compromise Google's internal practices
16			relating to competing products.
	Kuzniar	GRANTED as to the portions at:	The information requested to be sealed
17	Exhibit A		contains Google's highly confidential
18	GOOG- BRWN-	Seal Entirely	and proprietary information regarding
10	00858547		highly sensitive features of Google's internal systems and operations,
19			including various types of related
20			Google's internal projects, internal
21			databases, data signals, and logs, and their proprietary functionalities, as well
22			as internal metrics, that Google
			maintains as confidential in the ordinary course of its business and is
23			not generally known to the public or
24			Google's competitors. Such
25			confidential and proprietary
			information reveals Google's internal strategies, system designs, and business
26			practices for operating and maintaining
27			many of its important services, and falls
28			within the protected scope of the
20			Protective Order entered in this action.

1				See Dkt. 81 at 2-3. Public disclosure of
$_{2}$				such confidential and proprietary
_				information could affect Google's competitive standing as competitors
3				may alter their systems and practices
4				relating to competing products. It may
7				also place Google at an increased risk of
5				cybersecurity threats, as third parties
6				may seek to use the information to
				compromise Google's internal practices relating to competing products.
7	Dec	claration of	GRANTED as to the portions at:	The information requested to be sealed
8		sily	CILITYIZZ us to the portions un	contains Google's highly confidential
	Par	nferov	Pages 1:18, 1:20-24, 1:26-2:4, 2:7-	and proprietary information regarding
9			25, 3:8-9, 3:11-13	highly sensitive features of Google's
10				internal systems and operations, including various types of related
11				Google's internal projects, internal
11				databases, data signals, and logs, and
12				their proprietary functionalities, as well
13				as internal metrics, that Google
13				maintains as confidential in the ordinary course of its business and is
14				not generally known to the public or
15				Google's competitors. Such
				confidential and proprietary
16				information reveals Google's internal
17				strategies, system designs, and business practices for operating and maintaining
10				many of its important services, and falls
18				within the protected scope of the
19				Protective Order entered in this action.
20				See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
20				information could affect Google's
21				competitive standing as competitors
22				may alter their systems and practices
22				relating to competing products. It may also place Google at an increased risk of
23				cybersecurity threats, as third parties
24				may seek to use the information to
25				compromise Google's internal practices
	D.	alamatian at	CDANTED as to the most one of	relating to competing products.
26		claration of tthew	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential
27		rren	Pages 1:13, 1:15-16, 1:27-28, 2:1-2,	and proprietary information regarding
			2:4-6, 2:10-18, 2:10-22, 2:25-26,	highly sensitive features of Google's
28			2:28, 3:1	internal systems and operations,

	rious types of related
Google 5 Int	ternal projects, internal
	ta signals, and logs, and
	ary functionalities, as well
	<u> </u>
	metrics, that Google
	s confidential in the
	rse of its business and is
	known to the public or
	competitors. Such
confidential	1 1
	reveals Google's internal
	tem designs, and business
	operating and maintaining
	portant services, and falls
	protected scope of the
Protective Ord	der entered in this action.
See Dkt. 81 at	t 2-3. Public disclosure of
such confid	ential and proprietary
information	could affect Google's
competitive	standing as competitors
may alter the	eir systems and practices
relating to con	mpeting products. It may
also place Goo	ogle at an increased risk of
cybersecurity	threats, as third parties
may seek to	use the information to
compromise (Google's internal practices
·	npeting products.
Declaration of GRANTED as to the portions at: The informati	on requested to be sealed
Martin contains Goo	gle's highly confidential
Sramek Pages: 1:21, 1:26-27, 2:2, 2:9 and proprieta	ry information regarding
highly sensiti	ive features of Google's
internal sys	tems and operations,
including va	rious types of related
Google's int	ternal projects, internal
	ta signals, and logs, and
their proprieta	ary functionalities, as well
as internal	metrics, that Google
maintains as	s confidential in the
ordinary cour	rse of its business and is
	known to the public or
Google's	competitors. Such
confidential	and proprietary
information r	reveals Google's internal
	tem designs, and business
	operating and maintaining
	portant services, and falls
	protected scope of the
within the	

1			See Dkt. 81 at 2-3. Public disclosure of
$_{2}$			such confidential and proprietary
			information could affect Google's competitive standing as competitors
3			may alter their systems and practices
4			relating to competing products. It may
_			also place Google at an increased risk of
5			cybersecurity threats, as third parties may seek to use the information to
6			compromise Google's internal practices
7			relating to competing products.
<i>'</i>	Declaration	_	
8	Konstantin		contains Google's highly confidential
9	Psounis	Pages 1-13	and proprietary information regarding highly sensitive features of Google's
10			internal systems and operations,
10			including various types of related
11			Google's internal projects, internal databases, data signals, and logs, and
12			their proprietary functionalities, as well
			as internal metrics, that Google
13			maintains as confidential in the
14			ordinary course of its business and is
1.5			not generally known to the public or Google's competitors. Such
15			confidential and proprietary
16			information reveals Google's internal
17			strategies, system designs, and business
			practices for operating and maintaining many of its important services, and falls
18			within the protected scope of the
19			Protective Order entered in this action.
20			See Dkt. 81 at 2-3. Public disclosure of
20			such confidential and proprietary information could affect Google's
21			competitive standing as competitors
22			may alter their systems and practices
22			relating to competing products. It may also place Google at an increased risk of
23			cybersecurity threats, as third parties
24			may seek to use the information to
25			compromise Google's internal practices
	Psounis	GRANTED as to the portions at	relating to competing products. The information requested to be sealed
26	Exhibit B	GIVATIED as to the portions at	contains Google's highly confidential
27	GOOG-	Seal Entirely	and proprietary information regarding
28	BRWN- 00858535		highly sensitive features of Google's
20	00030333		internal systems and operations,

1		including various types of related Google's internal projects, internal
2		databases, data signals, and logs, and
3		their proprietary functionalities, as well as internal metrics, that Google
4		maintains as confidential in the ordinary course of its business and is
5		not generally known to the public or
6		Google's competitors. Such confidential and proprietary
7		information reveals Google's internal strategies, system designs, and business
8		practices for operating and maintaining many of its important services, and falls
9		within the protected scope of the Protective Order entered in this action.
10		See Dkt. 81 at 2-3. Public disclosure of
11		such confidential and proprietary information could affect Google's
12		competitive standing as competitors may alter their systems and practices
13		relating to competing products. It may also place Google at an increased risk of
14		cybersecurity threats, as third parties
15		may seek to use the information to compromise Google's internal practices
16		relating to competing products.
17	SO ORDE	RFD
18	SO ORDE	
19	DATED:	HON. SUSAN VAN KEULEN
20		UNITED STATES MAGISTRATE JUDGE
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